

NOTICE OF AMENDMENT

CERTIFIED - RETURN RECEIPT REQUESTED

March 14, 1997

Mr. Dwanye L. Foley
Vice-President of Operations
Northwest Natural Gas Company
220 NW 2nd Avenue
Portland, OR 97209

CPF No. 57103-M

Dear Mr. Foley:

On August 27-30, 1996, a representative of the Western Region, Office of Pipeline Safety, pursuant to Chapter 601 of 49 United States Code, conducted an onsite pipeline safety inspection of the Kelso Beaver Pipeline's (KBPL) records at Portland, OR, operated by Northwest Natural Gas Company.

As a result of a review of your operating and maintenance manual, the requirements for which are set forth in Section 192.605 (b) (1), the following inadequate procedures were noted:

1. § 192.605 Procedural manual for operations, maintenance, and emergencies.

(b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.

(1) Operating, maintaining, and repairing the pipeline in accordance with each of the requirements of this subpart and Subpart M of this part.

a. § 192.616 Public Education

Each operator shall establish a continuing educational program to enable customers, the public, appropriate government organizations, and persons engaged in excavation related activities to recognize a gas pipeline emergency for the purpose of reporting it to the operator or the appropriate public officials. The program and the media used must be as comprehensive as necessary to reach all areas in which the operator transports gas. The program must be

conducted in English and in other languages commonly understood by a significant number and concentration of the non-English speaking population in the operator's area.

At the time of the inspection, KBPL's continuing education procedure did not meet the requirements of 192.616. Operators of Transmission Facilities must communicate their programs to residents along their pipeline right-of-way. The programs and media used must be as comprehensive as necessary to reach all areas through which the company transports gas. The programs of operators in the same area should be coordinated to properly direct reports of emergencies and to avoid inconsistencies. Communication of general information must include the following.

- (a) Facts about the gas distributed or transported.
- (b) Importance of recognizing and immediately reporting a gas emergency.
- (c) How to report an emergency to the operator.
- (d) What action to take in an emergency or when gas leaks are detected.
- (e) Importance of reporting any odor of gas no matter how slight.
- (f) How to identify a pipeline marker.

Communication of specific information must include the following:

- (a) Information on how to recognize an emergency or potentially dangerous situation. This might include information on the possibility that escaping gas may be detected by sound and smell (if it is odorized), and by visual indications. Possible indicators that might be described include:
 - (1) An odor of gas in a building.
 - (2) A hissing sound.
 - (3) A fire in or near a gas appliance or piping.
 - (4) Unusual noise at an appliance.
 - (5) Unusual behavior of the flame at an appliance burner.
 - (6) Gas outside (odor, blowing, burning).
 - (7) Odor of gas where excavation work is in progress or has recently been completed.
- (b) Information on what action to take in an emergency or when gas leaks are detected until the operator can be notified and respond. This might include the following warnings:
 - (1) Do not attempt to locate gas leaks.
 - (2) Do not remain in the building when there is a strong gas odor.
 - (3) Do not turn lights on or off or unplug electrical appliances when there is a strong gas odor.

- (4) Do not use telephones in the area of a strong gas odor.
- (5) Do not use elevators.
- (6) Do not position or operate vehicles and powered equipment where leaking gas may be present.

b. § 192.617 Investigation of Failures

Each operator shall establish procedures for analyzing accidents and failures, including the selection of samples of the failed facility or equipment for laboratory examination, where appropriate, for the purpose of determining the causes of the failure and minimizing the possibility of a recurrence.

At the time of the inspection, KBPL's failure investigation procedure did not meet the requirements of 192. 617. A procedure should be prepared for the selecting, collecting, preserving, labeling and handling of specimens. Procedures for collecting metallurgical specimens should include precautions against changing the granular structure in the areas of investigatory interest (e.g., avoid heat effects from cutting and outside forces due to tools and equipment). When corrosion may be involved, procedures may be necessary for proper sampling and handling of soil and ground water specimens. Procedures controlling the cutting, cleaning, lifting, identifying and shipping of pipe specimens must be considered for preservation of valuable evidence on the pipe surface, and on any tear surfaces fracture faces, including making cuts far enough from the failure to avoid damaging critical areas of the specimen.

c. § 192.713 Transmission Lines: Permanent field repair of imperfections and damages.

a) Except as provided in paragraph (b) of this section, each imperfection or damage that impairs the serviceability of a segment of steel transmission line operating at or above 40 percent of SMYS must be repaired as follows:

- (1) If it is feasible to take the segment out of service, the imperfection or damage must be removed by cutting out a cylindrical piece of pipe and replacing it with pipe of similar or greater design strength.**
- (2) If it is not feasible to take the segment out of service, a full encirclement welded split sleeve of appropriate design must be applied over the imperfection or damage.**
- (3) If the segment is not taken out of service, the operating pressure must be reduced to a safe level during the repair operations.**

At the time of the inspection, KBPL's permanent field repair of imperfections and damage procedures were inadequate in that they did not meet the requirements of §192.713.

d. § 192.717 Transmission Lines: Permanent field repair of leaks.

(a) Except as provided in paragraph (b) of this section, each permanent field repair of a leak on a transmission line must be made as follows:

(1) If feasible, the segment of transmission line must be taken out of service and repaired by cutting out a cylindrical piece of pipe and replacing it with pipe of similar or greater design strength.

(2) If it is not feasible to take the segment of transmission line out of service, repairs must be made by installing a full encirclement welded split sleeve of appropriate design, unless the transmission line:

(I) Is joined by mechanical couplings; and

(ii) Operates at less than 40 percent of SMYS.

(3) If the leak is due to a corrosion pit, the repair may be made by installing a properly designed bolt-on-leak clamp; or, if the leak is due to a corrosion pit and on pipe of not more than 40,000 psi SMYS, the repair may be made by fillet welding over the pitted area a steel plate patch with rounded corners, of the same or greater thickness than the pipe, and not more than one-half of the diameter of the pipe in size.

At the time of the inspection, KBPL's permanent field repair of leaks procedure was inadequate in that it did not meet the requirements of 192.717.

Under 49 United States Code 60122, you are subject to a civil penalty not to exceed \$25,000 for each violation for each day the violation persists up to a maximum of \$500,000 for any related series of violations.

When it is found that an operator's procedures are inadequate, 49 C.F. R. §190.237 provides that the operator, after notice and opportunity for hearing, may be required to amend its plans and procedures. This letter serves to provide you with the notice of the inadequate procedures and the response options as prescribed under §190.237. If you do not wish to contest this notice, please provide your revised procedures within 30 days of receipt of this notice.

Also enclosed, and made part of this Notice, is a description of the available procedures for responding to this Notice. Please note that if you elect to make a response, you must do so within 30 days of your receipt of this Notice or waive your rights under 49 CFR §190.209. No response or a response which does not contest the allegations in the Notice authorizes the Associate Administrator, OPS to find the facts to be as alleged herein and to issue appropriate orders.

The 30-day response period may be extended for good cause shown and submitted within the original 90 days.

Please refer to **CPF No. 57103-M** in any correspondence/communication on this matter.

Sincerely,

Edward J. Ondak
Director

Enclosure

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